

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

1 JEFFREY WALKER, ) No 08-0801 CRB (PR)  
2 PLAINTIFF )  
3 VS )  
4 JANE LOVELLE SITE MANAGER )  
5 CAPTAIN *SABRINA BUTLER CJ-1* )  
6 CAPTAIN JANE DOE CJ-2 )  
7 SGT DOE CABE BE CJ \_8 )  
8 JO ROBINSON )  
9 DR. WOODARD )  
10 AMY COHEN )  
11 FAIR GARDNER )  
12 DON SEAVER )  
13 TAWNYA WEISHERT )  
14 DR. MOORIS )  
15 LAM CHEE )  
16 JOAN CAIRNS )  
17 LT PAULSEN )  
18 ERIKA FALK )  
19 TERRISA RICHARDSON )  
20 REINA FONG & sued in their )  
21 individual and official capacities )  
22 Defendants. )  
23 ----- )  
24 )  
25 )  
26 )  
27 )  
28 )

21 Violation of the eighth Amendment deliberate Idifference and neglegence to  
22 provide safe housing as well as prejudicial and discriminatory acts inwhich  
23 deprived plaintiff of the Equal protections of the procedural policies  
24 to the prevention and entervention of self injurous or suicidal attepts  
25 as a result all parties noted aboves neglegence it Created cruel and  
26 unusual punishment and placements in Safety cells for punishment rather than  
27 for mental health treatment, as well as S.A.P.H housing, which also was not done  
28 for mental health treatment, thus denying plaintiff of treatment.

1 and thus allowed plaintiff to be injured numerous times with no help  
2 and thus leaving plaintiff with life time injuries as well as mental  
3 health issues for life.

4

5 II.Statement of claim

6

7 Starting Between the Mounths of June 2005 and January 17 2006 Mental health  
8 and custody had both placed Plaintiff in Threatning and Paranoid sittuations  
9 that has resulted in self injurous and suicidal behavior and in all sitt-  
10 uations had caused mental health deteriation starting from:

11

12 1.on 6 10-2005 plaintiff had first made known his paranoia to LVN Theodore  
13 Barrantes and Robert Steiner Who had noted plaintiffs concerns and comp-  
14 laints that were causing Mental health deteriation and flash backs of  
15 prior prison incidents of assaults and riots, shooting death of aninmate  
16 while in a gladiater fight and other acts inwhich only some were recorded.  
17 It should also be noted that plaintiffs arrest charges had become an issue  
18 and it noted in the mental health files.

19 2.on 7-14-05 Plaintiff was placed in Safety cell after notifying S.,F.S.D  
20 he was having suicidal thoughts he had spoken to:Raymond bashista MFT  
21 Raymond Bashista had spoken with Jane Lovelle who was the SITE MaNager  
22 and Both had approved S/C Placement when noting Plaintiff did not meet  
23 the criteria.Both are being sued in their individual and official capacit-  
24 i.es for placing in the safety cell as punishment and thus disregarding  
25 plaintiffs mental health issues, *Denying plaintiff adequate treatment.*

26 3. on 7-15-05 Jane lovelle approved S.A.P.H. Housing with no intentions  
27 of treating plaintiffs mental health problems

28

2.

1 4.Dr Morrison and Jane lovelle had discussed plaintiffs case and had released him to  
2 G.P. a non mental health unit and had failed to provide mental health treatment,  
3 as a result plaintiff attempted to commit suicide.Lt.Stepp had came to talk to  
4 plaintiff were he had clibed up some bars in a holding tank and was going to dive  
5 head first until she interveined and prevented this.after this discussion the next  
6 day plaintiff was housed back into S.A.P.H. Housing, *CT-8*

7 Dr.Morrison and jane lovelle are being sued for this act in there individual and official  
8 capacities.as a result of there neglegence plaintiff had to suffer cruel and unusual  
9 punishment and a deteriation in mental health staus and was placed back in the S/c  
10 not for mental health reasons but for punishment

11 5.on 7-21-05 Raymond bashista notes Paranoia during enterview.

12 6 on 7-26-05 Dr Don seaver notes to continue S.A.P.H Housing noting plaintiff is still  
13 to fragile emotionaly.

14 7.Fair Gardner MA Noted Plaintiffs complaint of being sexually propositioned by another  
15 inmate in another pod C which caused further deteriation and staff still failed to  
16 treat Plaintiff

17 8.plaintiff had befriended Tw Tara White a female who was also housed in mental health  
18 were her and plaintiff had become close and on 8-2-05 plaintiff had made a complaint  
19 to Amy Cohen PHD working CJ that staff had kept the letter written to TW and had  
20 left it on the desk.

21 9.on 8-5-05 Amy Cohen had noted Plaintiff was lecturing his female Friend but did not  
22 note it was due to staff Sheriff officers encouraging Inappropriate sexual acts  
23 and that I told her to stop and staff got upset .

24 10.This was confirmed on 8-7-05 were Tessa richardson over heard plaintiff calling  
25 the sheriis officers rude,racist and perverts, after this, staff had deemed plaintiff  
26 a problem and had reversed the sittuation by falsifying reports and thus used  
27 plaintiffs charges to say he was the problem and was sexually harrasing Tw.

28 *r*

1 11, 8-05 Plaintiff was assaulted by officer quin and Mental health had failed to  
2 prevent or entervein to Safely house plaintiff and thus Fair Gardner had also  
3 Falsified a report in stating that plaintiff was a problem and had Placed plaintiff  
4 on a 5150 and a couple hours later, Joan cairns and Jane lovelle had removed the  
5 5150 hold threat to others, and had plaintiff rehoused in CJ 2 adsag disciplinary  
6 housing thats not mental health wich was done as punishment and were a denial of  
7 mental health treatment had accured.

8 so I am also suing Joan Cairns and Jane lovell for denying treatment and moving plaintiff  
9 to a non mental health unit for disciplinary reasons and as a result Plaintiff had  
10 become a threat to the safety of others in new unit and had to be placed back in  
11 Safety cell .

12 12.Not long after Plaintiff had arrived in new unit plaintiff was placed back in the  
13 safety cell were both custody had allowed plaintiff to:

14 1,Cut Wrist 2.Punch the walls causing injuries were blood was noted to have been  
15 seen and were plaintiff had also hurt his neck while banging headed in S/c  
16 to were plaintiff had endored this treatment for a second day until he was taken to  
17 Sanfrancisco General hospital for treatment.

18 Lam Chee Rn Had watched plaintiff several times hurting himself and becau plaintiff  
19 had asked for help to stop and requested restraint chair and it was denied  
20 so Lam Chee is also being sued in individual and official capacities.

21 Kim Morrison had noted that officer John or Jane Doe had accidentally admitted utincal  
22 and therefore this officer John or Jane doe is also being sued in their individual  
23 and official capacity due to there neglegence plaintiff had been able to injure self.

24 8-13-05 Amy Cohen Also kept plaintiff in this predicument even after being notified  
25 of injuries etc, and Raymond bashista MFT Had noted he will not place plaintiff  
26 on 5150 hold denying plaintiff treatment but had left him in S/C stating no mental  
27 health problem and thus used the room as punishment instead of for treatment.  
28 so both are being sued for this.in their official & individual capacities

1 13. on 8-15 x rays were done on plaintiffs hands from injuries in S/c  
2 on 8-24-05 Ray bashista had found plaintiffs website and notes plaintiff as a pimp  
3 and says there were his girls with him which was prejudicial as plaintiff is not a pimp  
4 had not been charged with pimping and yet this defamation of character was being con-  
5 tinously used and had been discussed and calling plaintiff a predator when infact plaintiff  
6 was aquitted of sexual assualt alligations.

7 14. 8-26-05 It was noted that plaintiff recievied bad news from court by Don seavers  
8 and were plaintiff had expressed his seriouness of the charges and facing life  
9 and thus was placed twice in safety cell again.

10 15. on 8-28-05 a meeting or conference was being conducted to adress plaintiffs case  
11 by Jane lovelle,JPS Captain, Subrina Butler CT-1 Before Incident

12 Plaintiff was rehoused in a non mental health unit.  
13

14 15. on 9-2-00 Plaintiff had been placed in a restraint chair on a 5150 hold and Tx To  
15 Sanfrancisco general Hospital and was placed in 7L suicide unit.

16 16. plaintiff was deemed a problem and a plan was being put in place to move him out the  
17 unit.

18 17.on 9-6-08 AMY Cohen PHD misrepresents the facts concerning plaintiff and his housing  
19 but on that same day a plan was being put together not for mental health reasons there  
20 goal being to diminish plaintiffs negative behavior and disruptive influence as much  
21 as possible.

22 18. On 9-8-05 Beheavioral and clinical management plan for Mr Walker was noted  
23 by Jane Lovelle,Captain Subrina Butler CT-1 Srgnt Cabebe, S.F.S.D  
24 Jo Robinson,Dr Woodard and JPS Site managers Doe defendats Staes:

25 Premeditation

26 Mr walker will be housed in adsag in a cell with another inmate( currently he has a  
27 do not house alone on his housing card See added pages:

28

1 The clinical and behavioral plan for Mr. Walker

2 1) Should he engage in superficial self harm behaviors (Scratching, superficial  
3 nicks, etc.) he will be transported to medical, JMS Staff will treat him and  
4 he will return to his cell.

5 Plaintiff was placed in a cell with another inmate and was feeling suicidal  
6 and was suffering from paranoia and he took a Razor and cut his wrist  
7 he was taken to JMS Medical where he told Sherman Hool at 11:53 cj1 Rn  
8 custody was advised per management orders to house Plaintiff back in  
9 same cell he cut himself in. Officer Cooper and John and officer Johnson  
10 and senior deputy burriss had escorted Plaintiff back to his cell.

11 12:51 an hour or so later Plaintiff cut himself again with a Razor this  
12 Time deeper approxamately a 1 inch long gaping lac with moderate amount  
13 of bleeding cleansed & applied pressure dressing.

14 Jane Lovelle site manager Had informed Santiago Hayo Rn & Custody  
15 to send Plaintiff to MEH for possible suturing.

16 2.) If he engages in more serious self harm gestures that may require sutures  
17 etc. he will be transported to meh to recieve medical treatment. when medical  
18 cleared he will return to the jail-He should not go to 7-1.

19 3.) if he does however meet criteria 5150 he will be placed in safety cell  
20 while awaiting tx to 7 L 4.) If he engages in serious self harm in the safet  
21 cell then he should be placed in restraint chair and the he would be tx  
22 emerency admitted to meh. Mr Walker should not be placed in restraint chair  
23 Just for threats of self harm

24 as a result of all parties noted in the agreement neglegence wich resulted  
25 in injury and caused cruel and unusual punishment denying plaintiff of  
26 mental health treatment and discriminating against him are all being  
27 sued in there individual and official capacities.

28

1 on 9-12-08 Plaintiff was brought back to the jail and placed back in the  
2 same cell he had sliced his wrist with a razor three times several days  
3 earlier in which he was admitted to S.F.G.H and was returned this day.  
4 Staff were aware of his suicidal statements and placed him in that cell anyway  
5 as a result of there neglegence and failure to provide adequate mental health  
6 treatment and safe housing Plaintiff once again cut his writ with a razor  
7 in G tank. Jane lovelle sitemanagers notes printed 9-12-08  
8 Plaintiff was taken to the hospital and the S.F.G.H contacted the Jail and  
9 said enough was enough and for them to provide Safe housing and it was the  
10 agreed to house plaintiff were he should have been all along in S.A.P.H  
11 Mental health Unit 7-L staff had denied him of this treatment on the pretext  
12 that his goal was to be close to a female TW who he has menacing attachment  
13 to but they then place him right next door to her in rm 1 she was in rm 2  
14 Through the mounths of september 2005 to Jan 2006 Plaintiff had s  
15 not recieeven any treatment and was ignored at all request for hel  
16  
17 When court had started plaintiff had ups and downs and was suffering with a  
18 variety of mental health issues and had no one to confide in when he tried  
19 to discuss his issues he was treated as if he was a behavioral problem rather  
20 than a patient:On ~~9-5-05~~ air garner noted that mental health needs to pay  
21 attention to Mr. Walker when his verdict will come which he might be at the  
22 time dangerous to acting out.  
23 All staff had known this includind site manager Jane Lovelle but  
24 Plaintiff had suffered several assaults on him by Sheriffs deputies while  
25 in S.A.P.H Housing and had ended up back in S.F.G.H Hospital and admitted  
26 to & L for treatment  
27  
28

1 1-3-05 Plaintiff had been placed in a restraint chair again and had complained  
 2 of being assaulted by sherrifs deputies who he had made sexual harrasment com-  
 3 plaints against to protect his friend TW Tara White.

4 Liza Dalmacio noted 1-6-05 Plaintiff said that deputy Jones assaulted him  
 5 and shown his face saying the mark is from a Foot print by sherriffs.

6 It was noted on 1-8-05 By Erika Falk Plaintiff was yelling at a sheriffs deputy  
 7 calling him a pervert saying he touches himself and verbaly abusing and alleged  
 8 Inpropriety. so staff had elected to get rid of Plaintiff despite his mental  
 9 condition and despite his court sittuation and a possible threat to harm  
 10 himself as noted many times stating to watch plaintiff during sentencing.

11

12 On 1-10-05 Erika Falk noted again Plaintiff having was observed making derog-  
 13 atory comments to W Chambliss and having a running commentary on the leval of  
 14 professionalism displayed by various staff.

15 Remove from S.A.P.H Dated 1-13-06 4 days before plaintiffs sentencing  
 16 ordered and approved by classification St.Hillare Jane Lovelle and site  
 17 managers all acting in a conspiracy to allow plaintiff to committ suicide  
 18 after his verdict or Hurt himself.

19 On 1-17-05 Sentencing Plaintiff had returned to his adsag cell and asked  
 20 for a razor when he was still under mental health follow ups and a no razor  
 21 policy officer Jane Doe gave him a razor and there adter Plaintiff had cut  
 22 his wrist Noted by John smith Nurse, Lam Chee, and jennifer Shealy LCSW  
 23 as a result of mental health neglegence in prevention and intervention from  
 24 a sittuation they had neww would happen had caused plaintiff to injure himself  
 25 and retain a life time injury and mental health treat ment. Plaintiff had suff  
 26 ered physically mentaly emotionaly for mounths and then this happened.

27 I swere under penalty of perjury the foregoing statements are true to the best  
 28 of my ability to recall and based on medical reports.

x-----  
 Jeffrey Weller ----- Date: June 9-08

Jeffrey Weller Request and demand for Jury Trial

Prayer for relief

Demand for Jury trial

compensatory Damages

1 1. 1,000,000 million Dollars Jointly and severly against defendants

2 Jane Lovelle, Captain Sabrina Butler CJ1 , SRGGT Cabebe  
3 Jo Robinson, Dr Woodward and any othersite manager does later Identified  
4 with the agreements 1-8-05 for the physical and emotional injuries  
5 sustained as a result of the plaintiffs Injuries and emotional issues.  
6 and faulures to provide adequate mental health treatment.

10 2) 100.000 Jointly and severly against defendants Fair Gardner, Amy Cohen

11 Tawnya weiser, Lam Chee, Terrisa Richardson, Reina Fong, Dr moorison, don seaver,  
12 Joan cairns, Jane lovelle for the punishment and emotional injuries resultir  
13 from there failure to provide adequate mental health treatment.

14

15 Punative damagesIn the following amount as staed to all parties up above  
16 noted in the same amounts to each defendant and any other such relief  
17 as it appears that plaintiff is entititled from state, county, and jail  
18 itself and any other areas not known to Plaintiff.

19 Respectfuly Submitted x--- Jeffrey Walker June 9-08  
20 Jeffrey Walker date-----

21

22 all parties were acting under color of state authority  
23 during all acts noted in violation of civil rights.

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